

Message

From: Wetherington, Michele [Wetherington.Michele@epa.gov]
Sent: 8/16/2018 6:36:08 PM
To: Cooper, Jamal [cooper.jamal@epa.gov]
CC: Gordon, Lisa Perras [Gordon.Lisa-Perras@epa.gov]
Subject: GA narrative ESA

I chatted with Carol yesterday on ESA. Her opinion hinges on what we think of the revision. Scientifically, the revision changes the stringency of the criteria, or it doesn't.

If it doesn't change the stringency we shouldn't need to consult.

We will need to consult if we determine the stringency does change. If it does change, it may change but within an acceptable range, making for a faster consultation. This could get a little tricky in that a small change to the stringency (adding "unreasonably" to interfere makes the EPD finding of not meeting the criteria slightly less likely) could be a problem for the most sensitive species. So, same plan of getting thoughts together next week and talk again.

Michele

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